

Exhibit A

Blocking Sanctions Regulations – “Transfer” Definitions

| Sanctions Scheme | 31 CFR Part | Section | Language |
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| North Korea | 510 | 510.324 | The term transfer . . . shall include . . . the issuance, docketing, filing, or levy of or under any judgment, decree, attachment, injunction, execution, or other judicial or administrative process or order, or the service of any garnishment. |
| Cuban Assets Control | 515 | 515.310 | The term <i>transfer</i> . . . shall include . . . the issuance, docketing, filing, or the levy of or under any judgment, decree, attachment, execution, or other judicial or administrative process or order, or the service of any garnishment. |
| Burma | 525 | 525.311 | The term <i>transfer</i> . . . shall include . . . the issuance, docketing, filing, or the levy of or under any judgement, decree, attachment, execution, or other judicial or administrative process or order, or the service of any garnishment. |
| Iran Assets Control | 535 | 535.310 | The term <i>transfer</i> . . . shall include . . . the issuance, docketing, filing, or the levy of or under any judgement, decree, attachment, execution, or other judicial or administrative process or order, or the service of any garnishment. |
| Narcotics Trafficking | 536 | 536.314 | The term <i>transfer</i> . . . shall include . . . the issuance, docketing, filing, or levy of or under any judgment, decree, attachment, injunction, execution, or other judicial or administrative process or order, or the service of any garnishment. |
| Zimbabwe | 541 | 541.309 | The term <i>transfer</i> . . . shall include . . . the issuance, docketing, filing, or levy of or under any judgment, decree, attachment, injunction, execution, or other judicial or administrative process or order, or the service of any garnishment. |
| Syrian | 542 | 542.317 | The term <i>transfer</i> . . . shall include . . . the issuance, docketing, filing, or levy of or under any judgment, decree, attachment, |

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| | | | injunction, execution, or other judicial or administrative process or order, or the service of any garnishment. |
| WMD Proliferators | 544 | 544.309 | The term <i>transfer</i> . . . shall include . . . the issuance, docketing, filing, or levy of or under any judgment, decree, attachment, injunction, execution, or other judicial or administrative process or order, or the service of any garnishment. |
| Darfur | 546 | 546.309 | The term <i>transfer</i> . . . shall include . . . the issuance, docketing, filing, or levy of or under any judgment, decree, attachment, injunction, execution, or other judicial or administrative process or order, or the service of any garnishment. |
| DRC | 547 | 547.309 | The term <i>transfer</i> . . . shall include . . . the issuance, docketing, filing, or levy of or under any judgment, decree, attachment, injunction, execution, or other judicial or administrative process or order, or the service of any garnishment. |
| Belarus | 548 | 548.309 | The term transfer . . . shall include . . . the issuance, docketing, filing, or levy of or under any judgment, decree, attachment, injunction, execution, or other judicial or administrative process or order, or the service of any garnishment. |
| Lebanon | 549 | 549.309 | The term transfer . . . shall include . . . the issuance, docketing, filing, or levy of or under any judgment, decree, attachment, injunction, execution, or other judicial or administrative process or order, or the service of any garnishment. |
| Ethiopia | 550 | 550.314 | The term transfer . . . shall include . . . the issuance, docketing, filing, or levy of or under any judgment, decree, attachment, injunction, execution, or other judicial or administrative process or order, or the service of any garnishment. |

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| Somalia | 551 | 551.314 | The term transfer . . . shall include . . . the issuance, docketing, filing, or levy of or under any judgment, decree, attachment, injunction, execution, or other judicial or administrative process or order, or the service of any garnishment. |
| Yemen | 552 | 552.311 | The term transfer . . . shall include . . . the issuance, docketing, filing, or levy of or under any judgment, decree, attachment, injunction, execution, or other judicial or administrative process or order, or the service of any garnishment. |
| Central African Republic | 553 | 553.309 | The term <i>transfer</i> . . . shall include . . . the issuance, docketing, or filing of, or levy of or under, any judgment, decree, attachment, injunction, execution, or other judicial or administrative process or order, or the service of any garnishment. |
| Mali | 555 | 555.311 | The term <i>transfer</i> . . . shall include . . . the issuance, docketing, filing, or levy of or under any judgment, decree, attachment, injunction, execution, or other judicial or administrative process or order, or the service of any garnishment. |
| South Sudan | 558 | 558.309 | The term <i>transfer</i> . . . shall include . . . the issuance, docketing, or filing of, or levy of or under, any judgment, decree, attachment, injunction, execution, or other judicial or administrative process or order, or the service of any garnishment. |
| Iranian Transactions | 560 | 560.326 | The term <i>transfer</i> . . . shall include . . . the issuance, docketing, filing, or levy of or under any judgment, decree, attachment, injunction, execution, or other judicial or administrative process or order, or the service of any garnishment. |
| Iranian Sector and Human Rights Abuses | 562 | 562.308 | The term <i>transfer</i> . . . shall include . . . the issuance, docketing, filing, or levy of or under any judgment, decree, attachment, injunction, execution, or other judicial or |

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| | | | administrative process or order, or the service of any garnishment. |
| Syria-Related | 569 | 569.311 | The term <i>transfer</i> . . . shall include . . . the issuance, docketing, filing, or levy of or under any judgment, decree, attachment, injunction, execution, or other judicial or administrative process or order, or the service of any garnishment. |
| Libyan | 570 | 570.310 | The term <i>transfer</i> . . . shall include . . . the issuance, docketing, or filing of, or levy of or under, any judgment, decree, attachment, injunction, execution, or other judicial or administrative process or order, or the service of any garnishment. |
| Iraq Stabilization and Insurgency | 576 | 576.313 | The term <i>transfer</i> . . . shall include . . . the issuance, docketing, filing, or levy of or under any judgment, decree, attachment, injunction, execution, or other judicial or administrative process or order, or the service of any garnishment. |
| Cyber-Related | 578 | 578.310 | The term <i>transfer</i> . . . shall include . . . the issuance, docketing, or filing of, or levy of or under, any judgment, decree, attachment, injunction, execution, or other judicial or administrative process or order, or the service of any garnishment. |
| Foreign Interference in U.S. Elections | 579 | 579.311 | The term <i>transfer</i> . . . shall include . . . the issuance, docketing, filing, or levy of or under any judgment, decree, attachment, injunction, execution, or other judicial or administrative process or order, or the service of any garnishment. |
| Nicaragua | 582 | 582.311 | The term <i>transfer</i> . . . shall include . . . the issuance, docketing, filing, or levy of or under any judgment, decree, attachment, injunction, execution, or other judicial or administrative process or order, or the service of any garnishment. |

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| Global Magnitsky | 583 | 583.312 | The term <i>transfer</i> . . . shall include . . . the issuance, docketing, filing, or levy of or under any judgment, decree, attachment, injunction, execution, or other judicial or administrative process or order, or the service of any garnishment. |
| Magnitsky Act | 584 | 584.312 | The term <i>transfer</i> . . . shall include . . . the issuance, docketing, filing, or levy of or under any judgment, decree, attachment, injunction, execution, or other judicial or administrative process or order, or the service of any garnishment. |
| Hong Kong-Related | 585 | 585.311 | The term <i>transfer</i> . . . shall include . . . the issuance, docketing, filing, or levy of or under any judgment, decree, attachment, injunction, execution, or other judicial or administrative process or order, or the service of any garnishment. |
| Russian Harmful Foreign Activities | 587 | 587.312 | The term <i>transfer</i> . . . shall include . . . the issuance, docketing, filing, or levy of or under any judgment, decree, attachment, injunction, execution, or other judicial or administrative process or order, or the service of any garnishment. |
| Western Balkans Stabilization | 588 | 588.308 | The term <i>transfer</i> . . . shall include . . . the issuance, docketing, or filing of, or levy of or under, any judgment, decree, attachment, injunction, execution, or other judicial or administrative process or order, or the service of any garnishment. |
| Ukraine Related | 589 | 589.309 | The term <i>transfer</i> . . . shall include . . . the issuance, docketing, or filing of, or levy of or under, any judgment, decree, attachment, injunction, execution, or other judicial or administrative process or order, or the service of any garnishment. |
| Transnational Criminal Organizations | 590 | 590.313 | The term <i>transfer</i> . . . shall include . . . the creation or transfer of any lien; the issuance, docketing, filing, or levy of or under any judgment, decree, attachment, injunction, execution, or other |

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| | | | judicial or administrative process or order, or the service of any garnishment. |
| Venezuela | 591 | 591.310 | The term <i>transfer</i> . . . shall include . . . the issuance, docketing, or filing of, or levy of or under, any judgment, decree, attachment, injunction, execution, or other judicial or administrative process or order, or the service of any garnishment. |
| Global Terrorism | 594 | 594.312 | The term <i>transfer</i> . . . shall include . . . the issuance, docketing, filing, or levy of or under any judgment, decree, attachment, injunction, execution, or other judicial or administrative process or order, or the service of any garnishment. |
| Foreign Terrorist Organizations | 597 | 597.317 | The term <i>transfer</i> . . . shall include . . . the issuance, docketing, filing, or levy of or under any judgment, decree, attachment, injunction, execution, or other judicial or administrative process or order, or the service of any garnishment. |
| Foreign Narcotics Kingpin Sanctions | 598 | 598.316 | The term <i>transfer</i> . . . shall include . . . the issuance, docketing, filing, or levy of or under any judgment, decree, attachment, injunction, execution, or other judicial or administrative process or order; the service of any garnishment. |

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